

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all other
similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' REQUESTED RELIEF
FOR PLAINTIFFS' DISPUTE 6 OF THE
APRIL 23, 2021 JOINT LETTER BRIEF**

[PROPOSED] ORDER

Before the Court is Plaintiffs' Dispute 6 from the April 23, 2021 Joint Letter Brief ("Plaintiffs' Dispute 6"). Having considered Plaintiffs' Dispute 6, the papers on file, argument at the April 29, 2021 hearing, and good cause having been shown, the Court **ORDERS** as follows:

By May 10, 2021, Google will produce documents responsive to Plaintiffs' Request for Production No. 10 as follows:

1. Data regarding Google's collection of the X-Client-Data header, including browsing data where there is no X-Client-Data header; and
2. Data tied to the cookies described in Plaintiffs' submission to this Court for Dispute 6.

This relief will not prevent or otherwise exclude Plaintiffs from seeking further relief related to Request for Production No. 10 upon a showing of good cause.

IT IS SO ORDERED.

DATED: _____

Honorable Susan van Keulen
United States Magistrate Judge

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Case No. 5:20-cv-03664-LHK-SVK

**[GOOGLE PROPOSED] ORDER
DENYING PLAINTIFFS' REQUEST TO
COMPEL ADDITIONAL DOCUMENTS
RELATED TO CLASS MEMBER
IDENTIFICATION (RFP NO. 10)**

Referral: Hon. Susan van Keulen, USMJ

1 **[GOOGLE PROPOSED] ORDER**

2 Before the Court is Plaintiffs' Request to Compel Additional Documents Related to Class
3 Member Identification (RFP No. 10) ("Plaintiffs' Request to Compel"). Having considered the
4 parties' papers filed in support and in opposition to Plaintiffs' Request to Compel, the Court hereby
5 **DENIES** Plaintiffs' Request to Compel.

6 **THEREFORE, IT IS ORDERED** that Plaintiffs' Request to Compel is **DENIED**.

7 **IT IS SO ORDERED.**

8
9 DATED: _____

10 HON. SUSAN VAN KEULEN
United States Magistrate Judge
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